

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

REGENLAB USA LLC,

Plaintiff,

V.

ESTAR TECHNOLOGIES LTD.,  
ECLIPSE AESTHETICS LLC,  
HEALEON MEDICAL, INC.,

Defendants.

Civil Action No. 1:16-cv-8771

**NOTICE OF DEFENDANTS ECLIPSE AESTHETICS, LLC, AND HEALEON MEDICAL, INC., MOTION FOR PRELIMINARY INJUNCTIONS AND STAY**

For the reasons set forth in the attached Memorandum of Law, Defendants Eclipse Aesthetics, LLC, and Healeon Medical, Inc., move this Court to enjoin Plaintiff's action against its customers, and/or enjoin improper communications to customers of Defendants, and/or after entry of the injunctions a severance and stay of the action against Defendants.

Specifically, Defendant requests a preliminary injunction enjoining the continuance of the customer suit; preventing the filing of additional lawsuits against other customers of Eclipse or Healeon; preventing Plaintiff from making additional claims or representations, either oral or written, outside of this lawsuit that any of the PRP products manufactured by Estar infringe any claim of the patent in suit. Additionally, subject to its request for a preliminary injunction as to the claims against customers, Defendants Eclipse and Healeon are requesting a severance and stay of the claims against them pending the outcome of the claims against the manufacturer Estar.

Respectfully submitted,

s/Vincent J. Allen

Vincent J. Allen

Texas Bar No. 24012209

Carstens & Cahoon, LLP

13760 Noel Rd., Suite 900

Dallas, TX 75240

Telephone: 972-367-2001

allen@cclaw.com

**ATTORNEY FOR DEFENDANT  
ECLIPSE AESTHETICS, LLC and  
HEALEON MEDICAL, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that counsel for Plaintiff Regenlab USA LLC were served with a copy of this document via the Court's CM/ECF system on July 6, 2017.

s/Vincent J. Allen

Vincent J. Allen